

FILED
U.S. DISTRICT COURT
EASTERN DISTRICT OF TEXAS

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION

SEP 20 2018

BY
DEPUTY _____

UNITED STATES OF AMERICA

§
§
§
§
§
§

v.

No. 6:18-CR-16
(Judge RWS/KNM)

HEON JONG YOO

a/k/a "HANK YOO"

SUPERSEDING INDICTMENT

THE UNITED STATES GRAND JURY CHARGES:

Counts One through Seven

Violation: 18 U.S.C. § 924(a)(1)(A)
(False statement with respect to
information required to be kept by
federal firearms licensee)

On or about the following dates, in the Eastern District of Texas, the defendant, **Heon Jong Yoo, a/k/a Hank Yoo**, knowingly made false statements and representations to a dealer licensed under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of the dealer, in that the defendant did execute a Bureau of Alcohol, Tobacco, Firearms, and Explosives Form 4473 Firearms Transaction Record and falsely listed his country of citizenship as "United States of America" when, in fact, he is not, and was not at the time of the false statements, a United States citizen:

COUNT	DATE	DEALER
1	9/13/16	Superior Firearms (Tyler, Texas)
2	11/03/16	First Cash Pawn (Tyler, Texas)
3	11/17/16	First Cash Pawn (Tyler, Texas)
4	11/17/16 (second visit)	First Cash Pawn (Tyler, Texas)

COUNT	DATE	DEALER
5	11/18/16	Academy Sports (Tyler, Texas)
6	11/06/17	Cash America Pawn (Tyler, Texas)
7	11/07/17	Cash America Pawn (Tyler, Texas)

In violation of 18 U.S.C. § 924(a)(1)(A).

Count Eight

Violation: 18 U.S.C. § 922(g)(4)
(Possession of firearm by
prohibited person)

On or about April 6, 2018, in the Eastern District of Texas, the defendant, **Heon Jong Yoo, a/k/a Hank Yoo**, having been committed to a mental institution, did knowingly possess, in and affecting interstate commerce, firearms, to wit:

- Mossberg 590 12-gauge shotgun.
- Smith and Wesson M&P 15 rifle.
- Smith & Wesson SW40VE .40 caliber pistol.
- DPMS LR-308 rifle.
- Para 1911 Expert .45 caliber pistol.

said firearms having been shipped and transported in interstate commerce.

In violation of 18 U.S.C. §§ 922(g)(4) and 924(a)(2).

NOTICE OF INTENT TO SEEK CRIMINAL FORFEITURE

Pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461

As a result of committing the offenses alleged in this Indictment, the defendant shall forfeit to the United States, pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461, any and all firearms, ammunition and accessories seized from the defendant, including but not limited to the following:

- Para 1911 Expert .45 caliber pistol (Serial No. 000210NW).
- Approximately 457 rounds of unknown manufacturer and caliber ammunition.

By virtue of the commission of the offenses alleged in this indictment, any and all interest the defendant has in the above-described property is vested in the United States and hereby forfeited to the United States pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461.

A TRUE BILL

9
9-19-18
Date:


GRAND JURY FOREPERSON

JOSEPH D. BROWN
UNITED STATES ATTORNEY



L. Frank Coan, Jr.
Assistant United States Attorney
Bar No. 170966 (Georgia)
110 N. College, Suite 700
Tyler, Texas 75702
(903) 590-1400
(903) 590-1439 Fax

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION

UNITED STATES OF AMERICA

v.

HEON JONG YOO
a/k/a "HANK YOO"

§
§
§
§
§
§

No. 6:18-CR-16
(Judge RWS/KNM)

NOTICE OF PENALTY

Counts One through Seven

VIOLATION: 18 U.S.C. § 924(a)(1)(A)

PENALTY: Imprisonment for not more than 5 years; a fine of not more than \$250,000; and a term of supervised release of not more than 3 years.

SPECIAL ASSESSMENT: \$100.00

Count Eight

VIOLATION: 18 U.S.C. §§ 922(g)(4) and 924(a)(2)

PENALTY: Imprisonment for not more than 10 years; a fine of not more than \$250,000; and a term of supervised release of not more than 3 years.

SPECIAL ASSESSMENT: \$100.00